

**To:** Lombardo, Ginny[Lombardo.Ginny@epa.gov]; Stanley, Elaine[stanley.elainet@epa.gov]  
**Cc:** Acree, Steven[Acree.Steven@epa.gov]  
**From:** Ford, Robert  
**Sent:** Wed 9/14/2016 7:52:52 PM  
**Subject:** RE: Aerovox Phase III Remedial Action Plan (RAP)  
Bedrock Flux.pptx

Ginny,

The approach to estimating flux of TCE transport to river sediments in Appendix B is about the best that can be done given the site complexity. For these calculations, one could increase the groundwater contaminant concentration, but, likewise, reasonably decrease the gradient or hydraulic conductivity. In essence, the estimated porewater concentration could reasonably be projected to cover a range (higher and lower). One would also anticipate that TCE would transport more readily through groundwater than PCBs.

It may be helpful to look at the attached diagram. I have highlighted two deep sediment zones with relatively high solid phase PCB concentrations. I have also shown the relative locations along this north-south transect of upgradient bedrock wells MW-15B, MW-34B and MW-07B. By examining the vertical distribution of PCB contaminant concentrations at sediment borings ASB-28 and ASB-29, it appears that the more problematic upland contaminant flux issue is in the more shallow overburden. All of the evaluated remedies have components that deal more directly with controlling this overburden flux.

Ultimately, it will be difficult to eliminate all potential flux from the fractured bedrock. Also, it is anticipated that some of the contamination likely extends to bedrock outside of the upland site boundary. The bedrock hotspot remedial action for OU-4 is a relatively common approach to try to reduce contaminant mass in fractured bedrock. As we had discussed in an early conversation, it is recommended that Region 1 contemplate an integrated remedy for the Acushnet River that combines some level of dredging in combination with capping to help mitigate any long-term, but more minor fluxes that may occur from bedrock.

It appears that the overburden remedial options that have been considered have taken to heart the concern of contaminant flux from the upland overburden.

Robert Ford

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**From:** Lombardo, Ginny

**Sent:** Wednesday, September 14, 2016 2:20 PM

**To:** Ford, Robert <Ford.Robert@epa.gov>; Stanley, Elaine <stanley.elainet@epa.gov>

**Cc:** Acree, Steven <Acree.Steven@epa.gov>

**Subject:** RE: Aerovox Phase III Remedial Action Plan (RAP)

Robert and Steve-

Did you look at Appendix B Mass Flux evaluation?

Ginny Lombardo, Chief

Remediation & Restoration II Branch

U.S. EPA Region 1 – New England

(617)918-1754

**From:** Ford, Robert

**Sent:** Wednesday, September 14, 2016 1:57 PM

**To:** Lombardo, Ginny <[Lombardo.Ginny@epa.gov](mailto:Lombardo.Ginny@epa.gov)>; Stanley, Elaine <[stanley.elainet@epa.gov](mailto:stanley.elainet@epa.gov)>

**Cc:** Acree, Steven <[Acree.Steven@epa.gov](mailto:Acree.Steven@epa.gov)>

**Subject:** RE: Aerovox Phase III Remedial Action Plan (RAP)

Ginny and Elaine,

Attached are comments from our review of the OU3 remedial alternatives analysis. Please contact me if you have any questions or requests for clarification.

Robert Ford

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**From:** Lombardo, Ginny

**Sent:** Wednesday, August 31, 2016 10:21 AM

**To:** Wolf, Steven NAE <[Steven.Wolf@usace.army.mil](mailto:Steven.Wolf@usace.army.mil)>; Morris, Mike (Bourne) <[Mike.Morris@jacobs.com](mailto:Mike.Morris@jacobs.com)>; Ford, Robert <[Ford.Robert@epa.gov](mailto:Ford.Robert@epa.gov)>; Catri, Cindy <[Catri.Cynthia@epa.gov](mailto:Catri.Cynthia@epa.gov)>; Stanley, Elaine <[stanley.elainet@epa.gov](mailto:stanley.elainet@epa.gov)>

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**Subject:** FW: Aerovox Phase III Remedial Action Plan (RAP)

Steve, Mike and Robert-

EPA intends to transmit comment on the Aerovox Phase III RAP to MassDEP by COB September 9, 2016. Please review and **get me comments on the document by COB September 8, 2016** so that I can consolidate comments to get to the DEP on the 9<sup>th</sup>. Our comments should be limited to matters related to the impact of the alternatives evaluated and the elements of the selected alternative on the Superfund cleanup and/or impacts to the harbor – i.e., generally our comments should relate to concerns or questions related to the OU3 remedial alternatives and OU3 selected alternative. I do not want to send DEP voluminous comments so please attempt to focus comments on significant concerns and issues. Thanks.

Kim Tisa may be issuing TSCA related comments on the Phase III directly to AVX.

Ginny Lombardo, Chief

Remediation & Restoration II Branch

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**From:** Stanley, Elaine

**Sent:** Tuesday, August 23, 2016 10:11 AM

**To:** 'Wolf, Steven NAE' <[Steven.Wolf@usace.army.mil](mailto:Steven.Wolf@usace.army.mil)>; 'Morris, Mike (Bourne)' <[Mike.Morris@jacobs.com](mailto:Mike.Morris@jacobs.com)>; Ford, Robert <[Ford.Robert@epa.gov](mailto:Ford.Robert@epa.gov)>; Catri, Cindy <[Catri.Cynthia@epa.gov](mailto:Catri.Cynthia@epa.gov)>; Lederer, Dave <[Lederer.Dave@epa.gov](mailto:Lederer.Dave@epa.gov)>; Barczynski, Hoshaiiah <[barczynski.hoshaiah@epa.gov](mailto:barczynski.hoshaiah@epa.gov)>; Dickerson, Dave <[dickerson.dave@epa.gov](mailto:dickerson.dave@epa.gov)>

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**Subject:** Aerovox Phase III Remedial Action Plan (RAP)

FYI - Please find below the MassDEP website link to download the Former Aerovox site 21E Phase III RAP which constitutes AVX's FS/Proposed Plan. It can be found under the date 08/22/16 and is 17 mb.

<http://public.dep.state.ma.us/fileviewer/Rtn.aspx?rtn=4-0000601>

Please let me know if you have trouble downloading, thanks.

Elaine

Elaine Stanley

Remedial Project Manager

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